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1 Q I'm asking you.

2 A I don't -- what do you mean?

3 Q So can a sheet metal driver be part
4 of a union, do you know?

5 A No, I have no idea.

6 Q Same with a yard worker, can a yard
7 worker be a unionized yard worker?

8 MR. MILMAN: Objection to the form
9 of the question. NLRA says anyone can be
10 unionized.

11 Off the record.

12 (Whereupon, a discussion was held
13 off the record.)

14 MR. MOHL: Back on the record.

15 Q So do you recognize this payroll
16 list?

17 A Yes.

18 Q Did you produce this?

19 A Yes.

20 Q So I'd like to go through the
21 individuals and ask you what they did. Okay?

22 A Okay.

23 Q Ronnie Alcantra, what did they do,
24 do you know? Look at the very top of the sheet,

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1 you can see that.

2 A That person's name is not -- he was
3 a field worker.

4 Q Did he touch sheet metal? As a
5 field worker, was he involved in sheet metal,
6 physical sheet metal?

7 A He was in the field, so he could
8 have been supervising, he could have been
9 sketching. He was in the field.

10 Q And what about Marlon Alvarado?

11 A He is in the shop.

12 Q And he touched sheet metal?

13 A Yes.

14 Q When I say touched sheet metal, I
15 mean physically involved with the metal itself.

16 MR. MILMAN: Fabrication?

17 MR. MOHL: Fabrication. It doesn't
18 just have to be fabrication, it could be
19 broader than that, I guess.

20 Off the record.

21 (Whereupon, a discussion was held
22 off the record.)

23 MR. MOHL: Back on the record.

24 Q Anthony Armstead, what did he do?

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1 A He was a driver.

2 Q Did he drive sheet metal products?

3 A He drove the truck.

4 Q And they had sheet metal in them?

5 A Yes.

6 Q And O'Neil Bowen, what did he do?

7 A He was in the field.

8 Q And did he deal with sheet metal in
9 the field?

10 A He could have.

11 Q Okay. Brandon Butler, what did he
12 do?

13 A In the field.

14 Q Did he deal with sheet metal in the
15 field?

16 A Yes.

17 Q Robert Butler, what did he do?

18 A He worked in the field as well.

19 Q Did he deal with sheet metal in the
20 field?

21 A Yes.

22 Q And Frankie Cafaro, what did he do?

23 A He was a driver.

24 Q Did he drive sheet metal products?

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1 A Yes.

2 Q Peter Campbell, what did he do?

3 A He was in the field.

4 Q And did he deal with sheet metal
5 products in the field?

6 A Yes.

7 Q Anthony Charbonier?

8 A I don't know.

9 Q Alain Comeau, I'm not saying that
10 right, Alain Comeau, what did they do?

11 MR. MILMAN: If you know.

12 A I don't know.

13 Q If you really don't know, just say
14 "I don't know".

15 A The name doesn't -- yeah.

16 Q Okay. Thomas Desimone?

17 A He worked in the field.

18 Q Did he deal with sheet metal in the
19 field?

20 A Yes.

21 Q Kevin Deterrus, what did he do?

22 A He worked in the field.

23 Q Did he deal with sheet metal in the
24 field?

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1 A Yes.

2 Q Omar Alfredo Duval Silfa?

3 A I don't know.

4 Q Matthew Fisher?

5 A I don't know.

6 Q Brian Fitzgerald?

7 A I don't know.

8 Q Robert Forst?

9 A I don't know.

10 Q Daniel Garcia?

11 A He was a driver.

12 Q Did he drive sheet metal products?

13 A Yes.

14 Q Dale Gleason?

15 A I don't know.

16 Q Jose Gomez?

17 A He worked in the shop.

18 Q Did he deal with sheet metal in the

19 shop?

20 A Yes.

21 Q Anthony Gomillion?

22 A I don't know.

23 Q David Gonzalez?

24 A Field worker.

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1 Q Did he deal with sheet metal in the
2 field?

3 A Yes.

4 Q Jillian Guido?

5 A Office staff.

6 Q Dwight Harris?

7 A Field.

8 Q Did he deal with sheet metal in the
9 field?

10 A Yes.

11 Q Edward Hemphill?

12 A I don't know.

13 Q Ambrosio Hernandez?

14 A He worked in the yard.

15 Q And did he deal with sheet metal in
16 the yard?

17 A I don't know. He could have been
18 sweeping it.

19 Q He could have been sweeping sheet
20 metal?

21 A You are kidding, right?

22 Q Sorry, it's a long day.

23 A That's me.

24 Q Doug Kern. And there is Richard

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1 Kern and Sharon Kern.

2 Andrew Lavecchio?

3 A He was a field worker.

4 Q He did sheet metal in the field?

5 A Yes.

6 Q Robert Leasure?

7 A I don't know.

8 Q Jorge Loreda?

9 A He was in the shop.

10 Q Did he deal with sheet metal in the
11 shop?

12 A Yes, barely.

13 Q Joseph Minieri?

14 A He worked in the shop.

15 Q Did he do sheet metal in the shop?

16 A Yes.

17 Q Amos Mullen?

18 A I don't know.

19 Q Timothy Mullins?

20 A I don't know who that one is either.

21 Q Patrick O'Connell?

22 A I don't know.

23 Q Nathan Perez?

24 A He was a field worker.

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1 Q Did he do sheet metal in the field?
2 A Yes.
3 Q Jason Renieris?
4 A I don't know.
5 Q Jonathan Ribbecca?
6 A I don't know.
7 Q Joseph Robinson?
8 A I don't know.
9 Q Walter Rodiguez?
10 A He was a field worker.
11 Q Did he do sheet metal in the field?
12 A Yes.
13 Q Leonard Russell?
14 A Leonard Russell, I think he was a
15 field worker.
16 Q Did he do sheet metal in the field?
17 A Yes.
18 Q Christopher Sanatass?
19 A He was a driver.
20 Q Did he drive sheet metal products?
21 A Yes.
22 Q Gabriel Sealy?
23 A I don't know.
24 Q Mitch Seitenberg?

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1 A I think he was a supervisor.

2 Q Did you supervise individuals
3 performing sheet metal work?

4 A I guess.

5 Q Timothy Short?

6 A Field.

7 MR. MILMAN: Can we go off the
8 record?

9 (Whereupon, a discussion was held
10 off the record.)

11 Q Enrique Soto?

12 A Field.

13 Q Did he do sheet metal work in the
14 field?

15 A Yes.

16 Q Devon Stewart?

17 A Field.

18 Q Did he do sheet metal work in the
19 field?

20 A Yes.

21 Q Milton Tacuri?

22 A Shop.

23 Q Did he do sheet metal work in the
24 shop?

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1 A Yes.

2 Q Anthony Tavitian?

3 A I don't know who that is.

4 Q Armondo Valdes?

5 A Driver.

6 Q Did he drive sheet metal products?

7 A Yes.

8 Q Michael Vassallo?

9 A Shop.

10 Q Did he do sheet metal work in the
11 shop?

12 A Yes.

13 Q Brock Weifenberg?

14 A I don't know.

15 Q Gregory Wiechering?

16 A I don't know.

17 Q I think that's everybody. Just a
18 few more questions and we are almost done.

19 So interrogatory number 5, back to
20 Exhibit 15. Okay? So number 5 we asked to
21 identify any transfer of your assets, your being
22 All Around's. So for any transfer listed,
23 identify the asset that was transferred. We asked
24 for the transfer of assets and everything related